

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

GENERAL MAJORITY PAC, a )  
Washington, D.C., not for profit )  
corporation, )

*Plaintiff,* )

v. )

CAROL AICHELE, in her official )  
capacity as Pennsylvania Secretary of )  
State; KATHLEEN KANE, in her )  
official capacity as Pennsylvania )  
Attorney General; JONATHAN M. )  
MARKS, in his official capacity as )  
Commissioner of Pennsylvania's )  
Bureau of Commissions, Elections )  
and Legislation; IAN HARLOW, in )  
his official capacity as Deputy )  
Commissioner of Pennsylvania's )  
Bureau of Commissions, Elections )  
and Legislation; and TRISHA )  
MALEHORN, in her official capacity )  
as Chief of the Division of Campaign )  
Finance and Lobbying Disclosure of )  
Pennsylvania's Bureau of )  
Commissions, Elections and )  
Legislation, )

*Defendants.* )

Civil Action No. \_\_\_\_\_

**PLAINTIFF GENERAL MAJORITY PAC'S MOTION FOR  
PRELIMINARY INJUNCTION**

Pursuant to Federal Rule of Civil Procedure 65, Plaintiff General Majority  
PAC ("GMP") hereby moves the Court for entry of an order preliminarily  
enjoining Defendants from implementing, enforcing or giving any effect to Title

25, Section 3252(a) of the Pennsylvania Election Code's prohibition on contributions to political committees by corporations, unincorporated associations, or unions, as applied to political committees, like GMP, that make only independent expenditures and do not make contributions to, or coordinated expenditures with, candidates or party committees, as those terms are defined under Pennsylvania law.

As set forth in the accompanying brief in support, GMP has demonstrated that it is likely to succeed on the merits, it will suffer irreparable harm if the requested injunction is not granted, Defendants will not suffer harm if the requested relief is granted, and the public interest favors injunctive relief.

In accordance with Local Rule 5.1(g), GMP submits a proposed order for the Court's consideration together with this motion.

Dated: February 24, 2014

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 24, 2014, I electronically filed the foregoing Motion for Preliminary Injunction and Brief in Support with the United States District Court for the Middle District of Pennsylvania by using the CM/ECF system and it was served upon all parties as follows:

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Dated: February 24, 2014

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